

Paul Gregory Lang, Esquire
Parlow and Lang PCs
3618 Hulmeville Rd Bensalem, PA 19020
215-639-4400
Email: Paulgregorylang@yahoo.com
Attorney for Debtors

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kevin W. Brinze	: CHAPTER 13
Donna L. Brinze	:
	: JUDGE: mdc
Debtors	:
	:
	: BANKRUPTCY NO. 22-11210 mdc

OBJECTION TO MOTION TO DISMISS CASE

TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:

Debtors, through their attorney, Paul G. Lang, Esquire, hereby represents as follows:

1. On or about May 10, 2022, the debtors filed a Chapter 13 Petition with this Court.
2. The debtors 341 Meeting of creditors was scheduled by the court for August 10, 2022. Counsel for debtor had a conflict and requested a new 341 Meeting date. The debtors due to their work schedule was delayed in supplying all of the requested documents timely. The debtors have just supplied the remaining documents needed by the trustee for review. All will be uploaded and a new 341 date requested prior to the hearing date on said Motion to Dismiss.
3. The debtors case is feasible and it is for the benefit of the estate for the case to continue.
4. For the above stated reason, the debtors through Counsel, requests that the Motion to Dismiss filed by the Trustee be denied.

WHEREFORE, Debtors, through undersigned, requests that this Honorable Court Deny the Trustees Motion to Dismiss Case.

Dated: 8/23/2022

/s/ Paul G. Lang, Esquire
Paul G. Lang, Attorney for Debtor